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Lead Counsel for the Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

TRENTON GLORE, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SANDISK CORP., SANJAY MEHROTRA,
and JUDY BRUNER,

Defendants.

Lead Case No. 3:15-CV-01455-VC

**REVISED STIPULATION AND
~~PROPOSED~~ ORDER REGARDING
TIME TO FILE CONSOLIDATED
CLASS ACTION COMPLAINT AND
SETTING SCHEDULE FOR BRIEFING
DEFENDANTS' MOTIONS TO DISMISS
AS MODIFIED
CLASS ACTION**

1 WHEREAS, on July 15, 2015, the Honorable Vince Chhabria issued an order consolidating
2 cases 15-cv-01455-VC, 15-cv-02050-BLF (VC), and 15-cv-02358-VC and identifying 15-cv-01455-
3 VC as the lead case (the “July 15 Order”);

4 WHEREAS, the July 15 Order appointed Union Asset Management Holding AG (“Union”) and
5 KBC Asset Management NV (“KBC”) (together, the “Union Group Plaintiffs”) as Lead Plaintiffs;

6 WHEREAS, Lead Plaintiffs and defendants SanDisk Corp. (“SanDisk”), Sanjay Mehrotra, and
7 Judy Bruner (collectively, “Defendants”), through their respective counsel, have conferred and agreed
8 upon a date for Lead Plaintiffs to file a Consolidated Class Action Complaint (the “Consolidated
9 Complaint”);

10 WHEREAS, Lead Plaintiffs and Defendants, through their respective counsel, have further
11 agreed upon the dates for Defendants to answer, move to dismiss, or otherwise respond to the
12 Consolidated Complaint, and the dates for briefing any such motion to dismiss;

13 WHEREAS, on May 22, 2015, the Court issued an order continuing the Case Management
14 Conference (“CMC”) until September 29, 2015;

15 WHEREAS, on July 27, 2015, the Court issued an order stating, *inter alia*, that the parties
16 should submit a revised scheduling stipulation and further indicating that any hearing on a motion to
17 dismiss to be filed by Defendants shall be held “some time in December of this year” (*see* ECF No. 80);
18 and

19 WHEREAS, in light of the current procedural posture of this case, the parties respectfully
20 request the CMC and related CMC and ADR deadlines be continued as set forth below.

21 Accordingly, IT IS HEREBY STIPULATED AND AGREED, by the parties, through their
22 undersigned counsel, subject to Court approval, as follows:

23 1. Lead Plaintiffs shall have until Friday, August 28, 2015 to file and serve their
24 Consolidated Complaint.

25 2. Defendants shall file their answer or motion to dismiss the Consolidated Complaint by
26 Wednesday, September 30, 2015.

3. Lead Plaintiffs shall file their opposition to any motion to dismiss by Wednesday, November 4, 2015.

4. Defendants shall file any reply in support of their motion to dismiss by Wednesday, November 25, 2015.

5. The hearing on any motion to dismiss to be filed by Defendants shall be held on Thursday, December 10, 2015.

6. The foregoing schedule may be modified by agreement of the parties with approval of the Court.

7. The CMC is continued ~~until after the hearing on a motion to dismiss is held~~ to January 19, 2016, at 10:00 a.m. Likewise, the deadlines for filing a Joint Case Management Statement or ADR documents pursuant to Civil L.R. 16-8 and ADR L.R. 3-4 are continued accordingly.

8. Pursuant to Local Rule 6-2 and 7-12, the foregoing schedule supersedes any other schedules provided in the Federal Rules or the Local Rules of the Court in any of the consolidated cases.

Respectfully submitted,

Dated: July 29, 2015

**ROBBINS GELLER RUDMAN
& DOWD LLP**

s/ Aelish Marie Baig
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Dated: July 29, 2015

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s/ Boris Feldman

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1 I, Aelish M. Baig, am the ECF user whose ID and password are being used to file this
2 Stipulation and [Proposed] Order Modifying Schedule for Lead Plaintiffs to File an Amended
3 Complaint and for Briefing on Defendants' Anticipated Motion to Dismiss. In compliance with Local
4 Rule 5- 1(i)(3), I hereby attest that counsel for Defendants, Boris Feldman, concurs in this filing.

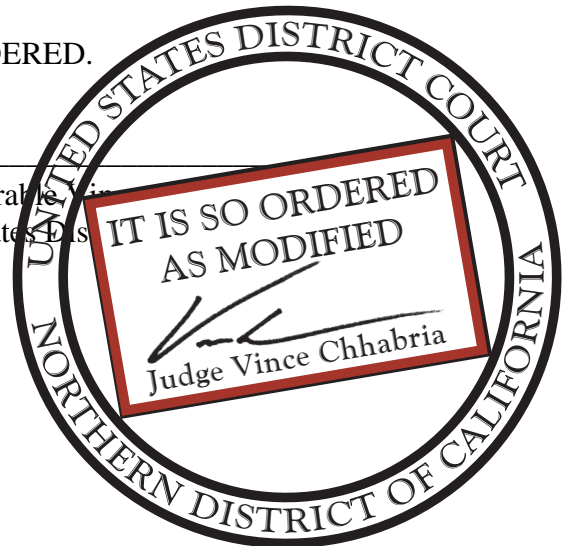
5 s/ Aelish Marie Baig

AELISH MARIE BAIG

6
7 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

8 DATED: July 30, 2015

9
10 The Honorable _____
United States District Judge



CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2015, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 29, 2015.

s/ Aelish Marie Baig

AELISH MARIE BAIG

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Mailing Information for a Case 3:15-cv-01455-VC Union Asset Management Holding AG, et al v. SanDisk Corporation, et al

Electronic Mail Notice List

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Manual Notice List

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- (No manual recipients)